

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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WAYNE CHARLES, SR.

Civ. Action No.
15-cv-09334

Hon. Paul A. Englemayer
U.S.D.J.

Plaintiff,

-against-

LEVITT & KAIZER, RICHARD LEVITT;
NICHOLAS KAIZER; BRENDAN WHITE;
GLENDA CHARLES;
MICHELLE KERN-RAPPY;
LEE POLLOCK; THE STATE OF NEW YORK;
THE BANK OF NEW YORK MELLON CORPORATION;
PAUL SHNEYER, individually and in his capacity as
the court appointed receiver of the Premises located at
80 West 120th Street, New York, New York 10027

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NOTICE OF CROSS MOTION REQUESTING INJUNCTIVE RELIEF

Please take notice that, upon the accompanying Memorandum of Law, the Declaration of J.A. Sanchez, and all other papers and proceedings herein, Plaintiff Wayne Charles, Sr., will move this Court before the Honorable Paul A. Englemayer, United States District Judge, at the United States District Courthouse for the Southern District of New York, 40 Foley Square, New York, New York 10007, at a dated and time to be determined by the Court, for an order granting a mandatory permanent injunction ordering that the Defendants and their agents, employees, or other representatives (including the Receiver they were able to have appointed by Judge Braun's court, Paul A. Shneyer: (1) be prohibited from transferring the Premises to a *bona fide* purchaser, (2) be

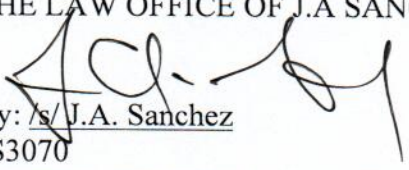
prohibited from carrying out any other acts as Receiver, (3) be informed that failure to comply with this Court's order shall be punished as contempt of court, and granting such other and further relief as the Court deems just and proper.

Dated: New York, New York

March 15, 2016

Respectfully submitted,

THE LAW OFFICE OF J.A SANCHEZ-DORTA, P.C.


By: /s/ J.A. Sanchez
JS3070

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